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6 Attorney for Defendant
Neil Brian Limtiaco

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8 UNITED STATES MAGISTRATE COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE LOUISA S. PORTER)

11 UNITED STATES OF AMERICA,) Criminal No. 08mj1443-POR
12)
Plaintiff,) Date: May 22, 2008
13) Time: 2:00 p.m.
v.)
14) NOTICE OF MOTIONS AND MOTIONS TO:
AN INDIVIDUAL CHARGED AS) 1) COMPEL DISCOVERY;
15 Neil Brian Limtiaco,) 2) APPLY RULES OF EVIDENCE; AND
16) 3) ALLOW PREPONDERANCE OF THE
Defendant.) EVIDENCE BURDEN OF PROOF
17)
18)

19 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and
FRED SHEPPARD, ASSISTANT UNITED STATES ATTORNEY

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21 PLEASE TAKE NOTICE that on May 22, 2008 at 2:00 p.m. or as soon thereafter as
22 counsel may be heard, the defendant charged as Neil Brian Limtiaco, by and through his counsel,
23 Anthony E. Colombo Jr., will ask this Court to enter an order granting the motions listed below.

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MOTION

The defendant in this case, by and through his attorney, Anthony E. Colombo Jr., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence and all other applicable statutes, case law and local rules, hereby moves this Court for an order to

- 1) compel discovery;
- 2) apply the rules of evidence; and
- 3) allow a preponderance of evidence burden of proof.

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Anthony E. Colombo Jr.
Attorney for the person charged as
Neil Brian Limtiaco

Dated: May 12, 2008